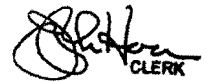


FILED

JUN 13 2014


CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF *South Dakota*

Civil Action No. 14-4094
(To be supplied by the court)

Matthew A. Smith, Plaintiff,

v.

United Parcel Service,

_____,

_____,

_____,

_____,

_____,

_____,

_____, Defendant(s).

(List each named defendant on a separate line.)

COMPLAINT

PARTIES

1. Plaintiff Matthew Alan Smith is a citizen of United States
who presently resides at the following address:
P.O. Box 350217 Westminister, CO 80035
2. Defendant United Parcel Service is a citizen of United States
who live(s) at or is/are located at the following address:
P.O. Box 283 St Louis, MO 63166
3. Defendant _____ is a citizen of _____
who live(s) at or is/are located at the following address:

(Attach a separate page, if necessary, to list additional parties.)

JURISDICTION

4. Jurisdiction is asserted pursuant to following statutory authorities:
U.S. Statutes (U.S.C.), ~~Smith~~ Revised Statutes (C.R.S.), The Civil Rights Act, Constitution, and Bill of Rights.

5. Briefly state the background of your case:

There was (Negligence in Accomodation and then Termination) between the Plaintiff, UPS, and its Counseling Firm Holland and Hart (Cause UPS). The Firms Fiduciary Duty is to Protect According to Law. As for entitlement redress according to law, company policy, company procedure, and company employment Contracts/Agreements there should have been granted accomodation according to the ADA Act and there should not have been termination according to Federal and State law. For this case cited as Matthew Alan Smith v. UPS and the relief sought there can be proven through Res Ipsa Loquitor and otherwise; negligence the only question remains negligent, wilful, intentional, or malicious by the court. *Statute of Limitations on Negligence Claims are 2 Years:
Both parties should have had equal procedural practice by the law.

The Statutory Authorities that apply at the least have been provided through complaint and through exhibit which fall under both state and federal jurisdiction that being Colorado (State) and the United States of America (Federal) as set forth by venue and otherwise.

The amount claimed will be a proper calculation/amount that can quantitatively almost immediately be proven.

**FIRST CLAIM FOR RELIEF
AND SUPPORTING FACTUAL ALLEGATIONS**
(Please number your paragraphs and attach any necessary additional pages.)

Exhibit A
Termination of Plaintiff

**SECOND CLAIM FOR RELIEF
AND SUPPORTING FACTUAL ALLEGATIONS**
(Please number your paragraphs and attach any necessary additional pages.)

Exhibit B
Company Policy and Procedure

**THIRD CLAIM FOR RELIEF
AND SUPPORTING FACTUAL ALLEGATIONS**
(Please number your paragraphs and attach any necessary additional pages.)

Exhibit C
ADA ACT

REQUEST FOR RELIEF

Plaintiff requests the following relief:

The Relief and Remedies I am seeking were caused by the reckless (by degree is intentional) acts, extreme and outrageous conduct, and practices that have procedurally had a negative effect on me. These damages are based on the acts as stated the question remains negligent, wilful, intentional, or malicious.

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Relief; Settlement; (Actions to Make Me Whole).

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The damages I am seeking are in indirect & direct alignment and correlated with the acts and practices I experienced during these proceedings.

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Damages; Actual Monetary Losses, Future Monetary Losses, Mental Anguish, and Overall Inconvenience. The plaintiff respectfully claims that through Property Torts, Assumption of Risk, Comparative Negligence, Contributory Negligence, Consent, Unanimous Consent, Negligence, Duty of Care, Standard of Care, Proximate Cause, Negligent Infliction of Emotional Distress, Quasi-Tort, Abuse of Process, Malicious Prosecution, Last Clear Chance Doctrine, ExTurpi Causa Non Oritur Actio, Quantum of Damages, Breach of Tort Duty, Incidental and Consequential Losses, Joint Liability, Several Liability, Joint and Several Liability, Comparative Responsibility, Evidence, and Legal Costs. There should be found in part or in all General Damages, Speculative Damages, Quantification of Personal Injury Claims (Emotional Distress), Special Damages, Statutory Damages, Nominal Damages, Contemptuous Damages, Aggravated Damages, and Restitutionary or Disgorgement Damages.

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Punitive Damages; (As determined by the Federal Court of Law.)

Date: 6-9-14


(Plaintiff's Original Signature)

P.O. Box 350217
(Street Address)

Westminster, CO 80038
(City, State, ZIP)

750-938-3766
(Telephone Number)